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March 4, 2019

**BY ECF**

The Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

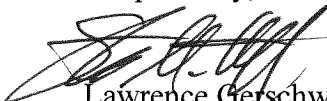
Re: *United States v. Sean Stewart*, 1:15-cr-00287-LTS

Dear Judge Swain:

We respectfully request that the Court modify Sean Stewart's bail conditions to remove the requirement that his personal recognizance bond be secured. The purpose of this request is to remove the home of Ryan Stewart, Sean's brother, as the security for the bond, so that the property will no longer be encumbered.

On June 27, 2018, Sean Stewart was released on bail under the following conditions: (1) A \$1,000,000 personal recognizance bond, secured by \$250,000 worth of cash, property, or security, to be signed by Defendant and one financially responsible person; (2) Defendant's travel is restricted to the continental United States; (3) Defendant must surrender his passport and make no new applications; (4) Defendant is subject to pretrial supervision; and (5) Defendant is subject to curfew. ECF No. 268. On August 3, 2018, the Court modified these conditions by removing the curfew and electronic monitoring requirements. ECF No. 272. Since his release, Mr. Stewart has complied with all of his bail conditions and pretrial supervision. Both John Moscato of SDNY Pretrial Services and Amanda Sanchez of EDNY Pretrial Services support this request. We have also conferred with AUSAs Richard Cooper and Sam Enzer, who have advised that the United States Attorney's Office does not object to the requested modification.

Respectfully,

  
Lawrence Gerschwer  
Steven M. Witzel

cc: Richard Cooper, Esq.  
Samson Enzer, Esq.